

Midnight Communications Limited Stakeholder Grievance Procedure

Purpose

At Midnight Communications, we believe trust is built through transparency and accountability, both in how we communicate and how we operate. We recognise the importance of providing a clear and accessible process for stakeholders to raise concerns or grievances and seek resolution.

This procedure applies to all external stakeholders, including clients, suppliers, partners and members of the public, and supports our purpose to advance responsible business practices through communications that promote transparency and accountability.

How to raise a concern

We encourage stakeholders to raise concerns directly via email at hello@midnight.co.uk. This inbox is monitored by senior leadership and treated confidentially.

Concerns can be raised confidentially, and anonymous submissions will be considered where sufficient information is provided.

What qualifies as a grievance

Concerns may relate to how we operate, who we work with, or the impact of our communications, including:

- Ethical concerns or misconduct
- Human rights, equality or discrimination issues
- Environmental or social impacts
- Business practices, including client or supplier conduct
- Breaches of company policies or legal obligations

Our process

We aim to handle all concerns in a way that is fair, transparent, and proportionate to our size:

- 1. Acknowledgement**
 - Within 5 working days
- 2. Initial assessment**
 - Determine whether the issue qualifies as a grievance
 - If not accepted, we will explain why
- 3. Investigation**

- Appropriate fact-finding, which may include internal review or discussions with relevant parties

4. Outcome & resolution

- We aim to provide a response within 30 working days where possible
- If more time is required, we will communicate this clearly

Communication

We commit to:

- Keeping the complainant informed at key stages
- Providing a clear, plain-English explanation of the outcome and any actions taken
- Confirming when the grievance is considered resolved

Non-retaliation

Midnight Communications has a zero-tolerance approach to retaliation.

No one will be disadvantaged or treated unfairly for raising a concern in good faith – this applies to clients, partners, suppliers and our wider network.

Confidentiality

All grievances will be handled with appropriate confidentiality. Information will only be shared on a need-to-know basis to enable proper investigation and resolution.

Governance & oversight

Grievances are overseen by the company's leadership team. We log and review all concerns (including where none are raised) and use any insights to improve how we operate and advise clients.

Where appropriate, learnings from grievances are reflected in our internal policies, client approach and annual Impact reporting.